



August 7, 2018

VIA ECF

Hon. Jesse M. Furman
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Jay Alix v. McKinsey & Co., Inc., et al.*, No. 18-CV-4141(JMF)

Dear Judge Furman:

We represent Plaintiff Jay Alix ("**Plaintiff**") in the above-referenced matter. We write to seek an extension of Plaintiff's time to file an amended pleading until **Tuesday, September 4, 2018**.

Defendants filed their motion to dismiss on July 30, 2018, pursuant to the May 17, 2018 Order (ECF 49) granting Defendants a 60-day extension to file an answer or otherwise respond to the Complaint. Pursuant to the Court's Order dated August 1, 2018 (ECF 66), the current deadline for Plaintiff to file an amended pleading or respond to Defendants' motion to dismiss is August 20, 2018.

Plaintiff requests this two-week extension to ensure sufficient time to analyze the points raised by Defendants in their motion to dismiss—which consists of a 68-page memorandum of law and over 700 pages of exhibits—and amend the Complaint—which consists of 145 pages (exclusive of exhibits) and currently contains seven causes of action (including multiple civil RICO claims) against ten Defendants. Additionally, the month of August coincides with multiple pre-existing professional obligations of Plaintiff's counsel (including a court hearing in Texas on August 27, 2018 and upcoming business travel to Southeast Asia on an emergency basis by two members of Plaintiff's legal team), as well as pre-scheduled summer vacations for both Plaintiff's counsel and key personnel of Plaintiff.

Plaintiff has not previously requested any adjournments or extensions of his time to amend the complaint.

Plaintiff's counsel has consulted with Defendants' counsel, and Defendants' counsel does not oppose the requested extension.

Currently there are no conferences scheduled before the Court. Pursuant to the Court's August 1, 2018 Order, the initial pretrial conference in this matter (which had been scheduled for August 22, 2018) is adjourned *sine die*. (ECF 66.)

Respectfully submitted,

/s/ Sean F. O'Shea
Sean F. O'Shea

Cc: All counsel of record (via ECF)

BOIES SCHILLER FLEXNER LLP